

1 Roopal P. Luhana  
**CHAFFIN LUHANA LLP**  
2 600 Third Avenue, Floor 12  
New York, NY 10016  
3 Telephone: (888) 480-1123  
luhana@chaffinluhana.com

4 Sarah R. London (SBN 267083)  
**GIRARD SHARP LLP**  
5 601 California St., Suite 1400  
San Francisco, CA 94108  
6 Telephone: (415) 981-4800  
7 slondon@girardsharp.com

8 Rachel B. Abrams (SBN 209316)  
**PEIFFER WOLF CARR KANE**  
9 **CONWAY & WISE, LLP**  
10 555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
11 Telephone: (415) 426-5641  
rabrams@peifferwolf.com

12 *Co-Lead Counsel for Plaintiffs*

14 **IN THE UNITED STATES DISTRICT COURT**

15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,  
17 PASSENGER SEXUAL ASSAULT  
LITIGATION

18 This Document Relates to:

19 ALL WAVE 1 BELLWETHER ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

20 **STIPULATION AND [PROPOSED]  
ORDER REGARDING MOTIONS TO  
STRIKE REBUTTAL EXPERTS**

Judge: Hon. Lisa J. Cisneros  
Courtroom: Courtroom G-15th Floor

22 WHEREAS, Uber moved to strike the supplemental report of Dr. Drumwright and portions of  
23 the rebuttal report of Dr. Lindsay Cameron, ECF 4271 & 4312;

24 WHEREAS, Judge Breyer determined that both motions fell under the purview of Magistrate  
25 Judge Cisneros pursuant to Order Referring Case for Discovery Purposes (ECF 66), ECF 4281 & 4321;

26 WHEREAS, Judge Cisneros denied both motions to strike without prejudice and ordered the  
27 parties to file joint letters under PTO 8 by November 14, 2025;

28 WHEREAS, Plaintiffs intend to move to strike portions of the rebuttal reports of Dr. Lindsay

1 Orchowski and Dr. Kristen Zgoba;

2 WHEREAS, the parties met and conferred and agreed that, in lieu of motions to strike, the  
3 parties will file joint letter briefs regarding Dr. Orchowski's and Dr. Zgoba's rebuttal reports on  
4 November 14, 2025.

5 **IT IS SO STIPULATED.**

6 DATED: November 8, 2025

7 Respectfully submitted,

8 By: /s/ Sarah R. London

9  
10 SARAH R. LONDON (SBN 267083)  
11 ANDREW R. KAUFMAN (*Pro Hac Vice*)  
12 GIRARD SHARP LLP  
13 601 California St., Suite 1400  
14 San Francisco, CA 94108  
15 Telephone: (415) 981-4800  
16 Email: slondon@girardsharp.com  
17 akaufman@girardsharp.com

18 RACHEL B. ABRAMS (Cal Bar No. 209316)  
19 ADAM B. WOLF (Cal Bar No. 215914)  
20 SARA B. CRAIG (Cal Bar No. 301290)  
21 PEIFFER WOLF CARR KANE CONWAY  
22 & WISE, LLP  
23 555 Montgomery Street, Suite 820  
24 San Francisco, CA 94111  
25 Telephone: 415.766.3544  
Facsimile: 415.840.9435  
Email: rabrams@peifferwolf.com  
awolf@peifferwolf.com  
scraig@peifferwolf.com

26 ROOPAL P. LUHANA (*Pro Hac Vice*)  
27 CHAFFIN LUHANA LLP  
28 600 Third Avenue, Fl. 12  
New York, NY 10016  
Telephone: (888) 480-1123  
Email: luhana@chaffinluhana.com

29  
30 *Co-Lead Counsel for Plaintiffs*

1 Dated: November 8, 2025

KIRKLAND & ELLIS LLP

2 /s/ Laura Vartain

3  
4 Laura Vartain (SBN 258485)  
laura.vartain@kirkland.com  
5 555 California Street  
San Francisco, CA 94104  
6 Telephone: (415) 439-1400

7 Allison M. Brown (*Admitted Pro Hac Vice*)  
alli.brown@kirkland.com  
8 2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
9 Telephone: (215) 268-5000

10 *Attorneys for Defendants*  
11 UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing.

Dated: November 8, 2025

/s/ Andrew R. Kaufman

Andrew R. Kaufman

1  
2                   **UNITED STATES DISTRICT COURT**  
3                   **NORTHERN DISTRICT OF CALIFORNIA**  
4                   **SAN FRANCISCO DIVISION**

5                   IN RE: UBER TECHNOLOGIES, INC.,  
6                   PASSENGER SEXUAL ASSAULT  
7                   LITIGATION

Case No. 3:23-MD-03084-CRB (LJC)

8                   **[PROPOSED] ORDER REGARDING**  
9                   **MOTIONS TO STRIKE REBUTTAL**  
10                  **EXPERT REPORTS**

This Document Relates to:

ALL WAVE 1 BELLWETHER  
ACTIONS

Having considered the parties' Stipulation, the Court orders as follows:

The parties will file joint letter briefs regarding Dr. Orchowski's and Dr. Zgoba's rebuttal reports on November 14, 2025.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

Honorable Lisa J. Cisneros  
United States Magistrate Judge